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May 10, 1999

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Magalie Roman Salas
Office of the Secretary
Federal Communication Commission
225 Twelfth Street, SW Room TW-325
Washington, DC 20554

RE: SBC Communications Inc. and Ameritech Corporation (CC Dkt. No 98-141)

Dear Ms Salas:

On behalf of Community Technology Institute (CTI), the Community Voice Mail Federation, and thousands of phoneless Americans, we are pleased to submit these comments in response to last week's hearings on the proposed merger between SBC Communications, Inc. and Ameritech Corporation. We commend Chairman Kennard's request for conditions that address public interest concerns, and we support the recommendations submitted on April 29, 1999, by the Benton Foundation and OMB Watch.

We are particularly interested in addressing objectives that would increase telephone penetration in the United States. Universal service to telecommunications was meant to ensure fair and equal access to basic telephone service for all Americans, "as far as possible." [Sec 254, Telecommunications Act of 1996] In 1997, the Center for Media Education reported that six percent of Americans live without telephone service, with 43 percent of impoverished individuals falling into this category¹.

These numbers point up the conditions yielded and perpetuated by disconnection. In concrete terms, imagine trying to find a job without a phone. What would your likeliness of success be without a reliable contact number to place on your resume? Even with public access to high-speed bandwidth and a healthy economy, the lack of a phone remains the most potent barrier to timely response in a competitive and increasingly impatient market.

We believe it is possible and prudent to strengthen the Lifeline/Linkup program while maintaining cost effectiveness. Our comments are based on experience that spans six years and twenty-eight communities², providing more than 12,000 phoneless and homeless Americans everyday with the closest available substitute to dialtone: personalized voicemail. Our model, Community Voice Mail, affords a community the ability to provide its poorest members with a private, direct, and reliable contact so that they may connect to opportunities for employment and housing, medical and social services, and loved ones, 24 hours a day.

¹ Center for Media Education, *Ensuring Telephone Access in the Digital Age*, Mark Cooper Ph.D., 1998.

² Albany & New York City NY, Atlanta GA, Bellingham, Seattle, Spokane, Vancouver & Yakima WA, Boston MA, Chattanooga & Memphis TN, Chicago IL, Detroit MI, Eugene, Portland & Salem OR, Hampton Roads VA, Houston TX, Los Angeles, San Diego, San Francisco & San Jose CA, Minneapolis-St. Paul MN, New Orleans LA, Phoenix AZ, Raleigh NC, St. Petersburg FL, and Bermuda

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Meaningful applications of technology exist that can correct many social problems, including the disconnection associated with lack of telephone service. As a San Diego case manager put it, "If you don't have a phone in the 90s, you don't have anything."³ On behalf of the thousands of phoneless Americans and the communities wishing to better serve them, I urge you to remain steadfast in your commitment to Sec. 254 of the Telecommunications Act, which ensures communication services be made available, as far as possible, to all people of the United States.

Sincerely,



Robert Richmond
CEO, Active Voice Corporation
Chairman, CTI Board of Directors



Jennifer Brandon
Executive Director
Community Technology Institute

Enc.

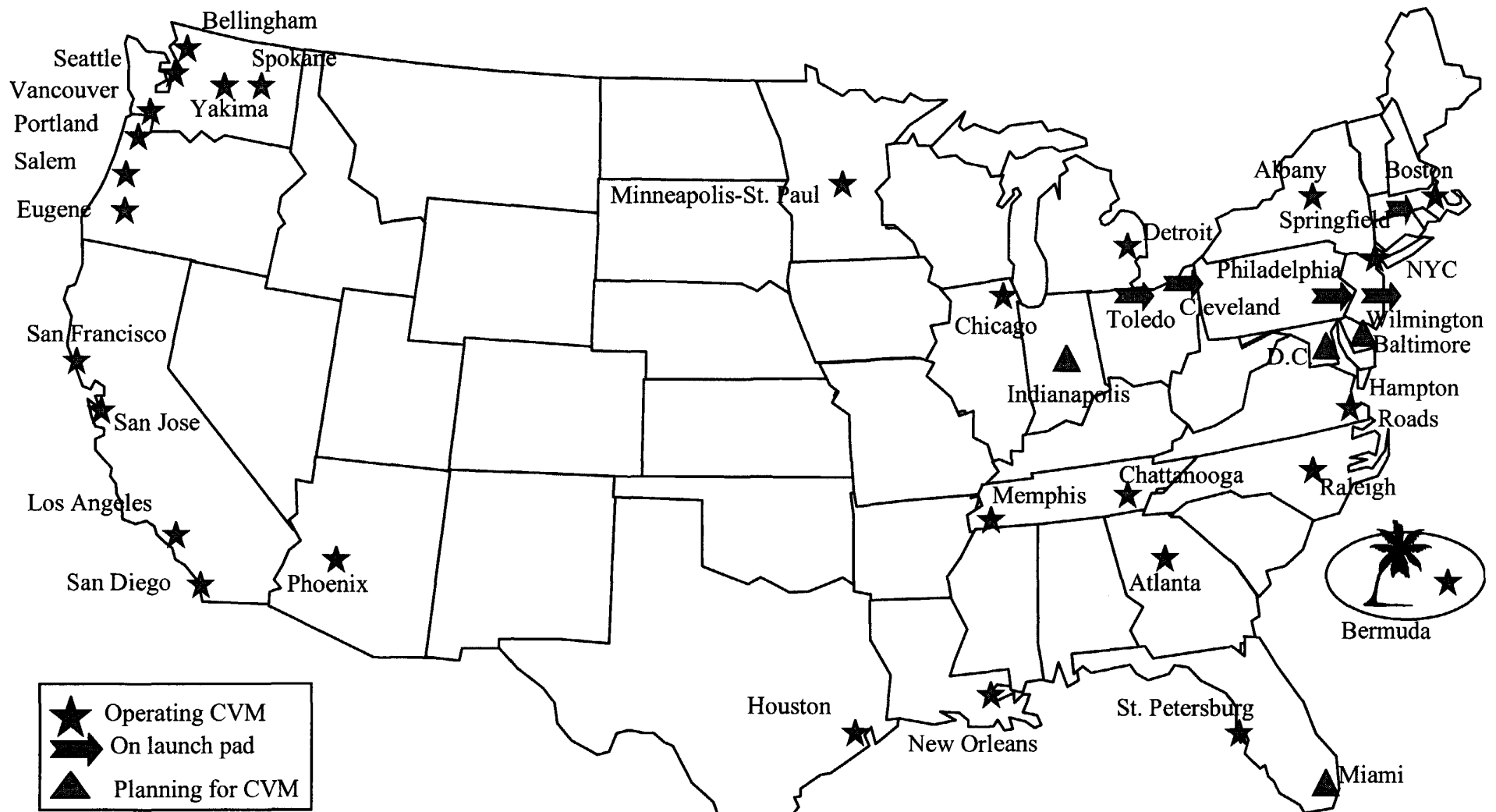
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³ Community Technology Institute Evaluation, 1997.

The Community Voice Mail Federation: Connecting Thousands of People Everyday



The mission of Community Technology Institute is to further the use of telecommunications and other innovative technologies, including the replication of Community Voice Mail around the world, to assist poor and homeless people and to improve the human services delivery system.

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